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December 18, 2000

Rebecca MacPherson
Office of the Chief Counsel, NCC-20
National Highway Traffic Safety Administration
400 Seventh Street, SW
Washington, DC 20590

Dear Ms. MacPherson:

The Association of International Automobile Manufacturers, Inc. (AIAM) appreciates the opportunity provided by the National Highway Traffic Safety Administration (NHTSA) to discuss with the Agency our concerns with the test procedures for the advanced air bag final rule at the December 6, 2000 Technical Workshop. As demonstrated by the participants in the workshop and the comments and petitions submitted to NHTSA, there are many important but unresolved technical issues affecting automobile manufacturers and restraint system suppliers with regard to the test procedures. We are pleased with the Agency's efforts to resolve these issues and publish a response to the petitions quickly. However, especially in view of the changes that may occur at NHTSA and the Office of Management and Budget in January as a result of the new Administration, we are concerned about potential delays in the release of the response, which could seriously limit the amount of time available for system designers to work with the new procedures. In many cases, airbag designs will need to be finalized by early 2001 for the 2003 models.

To facilitate the design of systems meeting the new advanced air bag requirements within the timeframe specified in the final rule, AIAM requests that the Agency consider preparing a Draft Technical Research Report on the test procedure issues for the docket. This report would document the results of testing of the new procedures by the NHTSA Vehicle Research and Test Center, with the understanding that the final, approved procedures could be somewhat different from those in the Technical Report. This report could be placed in the docket and available to interested parties prior to publication of the Agency's notice responding to the petitions for reconsideration. This would provide system designers with additional lead time to work with what are likely to be the new test procedures – time which might otherwise be lost while the Agency's notice is undergoing its required review. A similar procedure was followed in NHTSA's recent rulemaking on upgrading FMVSS 301, Fuel System Integrity.





Thank you for considering this suggestion, and please call me at 703/247.2105 if you would like to discuss this issue further.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael X. Cammisa". The signature is fluid and cursive, with a long horizontal stroke at the end.

Michael X. Cammisa
Director, Safety

cc: Stephen Kratzke, Assoc. Administrator for Safety Performance Std.
Ed Jettner, Office of Crashworthiness Standards
Docket Management (NHTSA-2000-7013)